

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
TIMOTHY LEE WILKINSON :
CHRISTINE MARIE WILKINSON : CASE NO. 1:19-bk-03021
: ADVERSARY NO.
Debtor(s) :
: Nature of Proceeding Objection to Motion
: to Modify Plan
21st Mortgage :
Plaintiff(s)/Movant(s) : Document #:
vs. :
TIMOTHY LEE WILKINSON :
CHRISTINE MARIE WILKINSON :
Defendant(s)/Respondent(s)

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance².

Reason for the continuance. Parties require additional time to resolve.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated:January 8, 2021

/s/ Kara K. Gendron

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¹No alterations or interlineations of this document are permitted.

²If this is not a first request for a continuance, then a Motion to Continue must be filed.